

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 08-_____
v.	:	DATE FILED _____
EDUARD BERENSHTEYN	:	31 U.S.C. § 5324(a)(1) (aggravated
STANISLAV ZARUBIN	:	structuring of financial transactions - 1
		count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about June 2007 through in or about November 2007, in the Eastern District of Pennsylvania, defendants

EDUARD BERENSHTEYN
and
STANISLAV ZARUBIN,

for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder, knowingly caused and attempted to cause a domestic financial institution to fail to file Currency Transaction Reports ("CTR") for currency transactions in excess of \$10,000, by cashing checks totaling in excess of \$10,000 at one time with a check casher without a CTR being filed, including, but not limited to, cashing approximately \$161,530 in checks on or about November 6, 2007, as part of a pattern of illegal activity involving transactions of more than \$100,000, that is, approximately 24 transactions totaling over \$2 million, in a twelve-month period.

In violation of Title 31, United States Code, Sections 5324(a)(1) and (d)(2).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 31, United States Code, Section 5324(a)(1) and (d)(2), set forth in this indictment, defendants

**EDUARD BERENSHTEYN
and
STANISLAV ZARUBIN**

shall forfeit to the United States of America any and all property involved in such offense and any property traceable to such property.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 31, United States Code, Sections 5317(c)(1)(A) and (B), incorporating Title 21, United States Code, Section 853(p), to seek

forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 31, United States Code, Section 5317(c)(1).

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**